

1
2
3
4 E-FILED on 9/21/2015
5
6
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11
12 UNITED STATES OF AMERICA,

CR-13-0076-RMW

13 Plaintiff,

STIPULATION BIFURCATING
FORFEITURE COUNTS AND WAIVING
JURY ON THE BIFURCATED COUNTS

14 v.

15 LENNIE LUAN LE and QUOC CHI TRAN,

16 Defendants.

17
18
19 The indictment in this case includes two forfeiture allegations. The first forfeiture allegation
20 seeks forfeiture of property used in a gambling operation pursuant to 18 U.S.C. § 1955(d). The
21 second allegation asserts forfeiture of proceeds of specified unlawful activity as called for under 18
22 U.S.C. § 981(a)(1)(C) and 28 U.S.C. 2461(c). The parties stipulate that these forfeiture counts can be
23 bifurcated and tried by the court without a jury following the verdict in the trial of the first three
24 counts.

25 1. The defendants Lennie Luan Le and Quoc Chi Tran hereby waive their right to a jury trial
26 on the forfeiture counts;

27 2. The government consents to the jury waiver;

1 3. Mr. Le and Mr. Tran understand that they have the right to have the forfeiture allegations
2 tried by a jury;

3 4. Mr. Le and Mr. Tran understand that a jury trial would mean that the forfeiture allegations
4 would be tried by 12 people who must all agree on the verdict:

5 5. If the waiver is accepted, the court (judge) will try the case and make the decision on the
6 forfeiture allegations; and

7 Counsel for Mr. Le and Mr. Tran confirm that they have discussed the advantages and
8 disadvantages of a trial by jury with their clients.

9
10 DATED: September 21, 2015



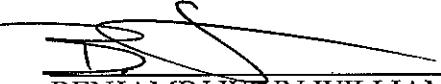
LENNIE LUAN LE



JOHN J. JORDAN
Attorney for Lennie Luan Le



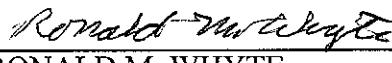
QUOC CHI TRAN



BENJAMIN WINN WILLIAMS
Attorney for Quoc Chi Tran

20 I find that each defendant has knowingly and voluntarily agreed to bifurcation and knowingly
21 and voluntarily waived the right to a jury trial on the bifurcated forfeiture counts.

23 DATED: 9/21/2015



RONALD M. WHYTE
United States District Judge